

Exhibit 41

1 IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEW JERSEY
2 CAMDEN VICINAGE

4 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
 AND IRBESARTAN PRODUCTS

5 LIABILITY LITIGATION Civil No.
19-2875.

6 ***** (RBK/JS)

THIS DOCUMENT APPLIES TO ALL
7 CASES

HON ROBERT B.
KUGLER

8 *****

9 - CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

10
11 VIDEOTAPED DEPOSITION OF JUCAI GE
12 APRIL 30, 2021
VOLUME IV

Continuation of the Remote Videotaped via
Zoom Deposition of JUCAI GE, commencing at 7:23 a.m.
China Standard Time, on the 30th of April, 2021,
before Juliana F. Zajicek, Registered Professional
Reporter, Certified Shorthand Reporter and Certified
Realtime Reporter.

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23 GOLKOW LITIGATION SERVICES
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1 For the NDMA impurity investigation,
2 Mr. Chen never got involved in the root cause
3 analysis, root cause investigation or creation of the
4 deviation report. He never got involved. All he
5 knows is from the reports we provided to him.

6 MR. GOLDBERG: Thank you. I have no further
7 questions.

8 MS. HILTON: I have some follow-up questions.

9 FURTHER EXAMINATION

10 BY MS. HILTON:

11 Q. Ms. Ge, you just testified that all of the
12 chairman of the company, Baozhen Chen, knows is from
13 the reports we provided to him.

14 How do you begin to purport to know what
15 knowledge Mr. Chen has about NDMA?

16 A. He organized a meeting or meetings on the
17 topic of NDMA in valsartan. He did organize such a
18 meeting or meetings.

19 Q. So --

20 A. During the meeting we all reported or all
21 of the departments reported to him regarding the
22 progress of the investigation and -- and -- and other
23 information.

24 Q. During the meetings, what did Mr. Chen say

1 to you?

2 A. I can't describe to you the gist of his
3 statement to you. I cannot recall the original
4 wording of his and I cannot recall which meeting he
5 made such statements in.

6 Q. But for Mr. Goldberg, you were able to
7 definitively state that -- that all that Mr. Chen knew
8 was from the reports that were provided to him. So if
9 you were able to definitively make that statement with
10 respect to Mr. Goldberg's question about these
11 meetings, I -- I would like you to at least try to
12 remember what it was that Mr. Chen said during those
13 meetings that made you so sure that that was the level
14 of Mr. Chen's knowledge about NDMA?

15 A. He would always tell us to conduct
16 investigations in compliance of the requirements of
17 the GMP. He also asked the QC department to work with
18 the QA department for the investigation as much as
19 possible. He also asked the QC department whether
20 there is enough GC-MS equipment and do -- does the QC
21 have to buy more. If so, the GC-MS shall be purchased
22 according to QC department's plan.

23 So it's pretty much about it, all
24 regarding the management aspect.

1 Q. Please give me your best estimate as to
2 how many meetings you participated in with Mr. Chen
3 regarding NDMA?

4 A. I don't remember exactly how many times.

5 Q. Give me your best estimate.

6 A. My estimate would not be that accurate.
7 Is that okay?

8 Q. Yes.

9 A. Well, I would just provide a rough
10 estimate.

11 Q. Yes, please pro -- provide it right now.

12 A. For all kinds of meetings where NDMA was
13 mentioned, I believe it's five meetings also.

14 Q. Okay. Who attended these roughly five
15 meetings with Mr. Chen regarding NDMA?

16 A. I don't recall who specifically those
17 attendees were, but typically I would attend for the
18 meetings I was there and a QP would be there, people
19 from QC would be there. So it's pretty much people
20 from those department, although the attendees would
21 vary. They would be there to follow up with the
22 progress and sometimes vice president Min Li --
23 spelled as M-i-n, last name L-i -- would also be
24 there, but I don't recall specific attendees.

1 Q. Did you take notes during these
2 approximately five meetings with Mr. Chen?

3 A. There was nothing to take notes for. I
4 never take notes. All he said was, Hey, hurry up or
5 do it according to the GMP requirement. It's nothing
6 worth taking notes for.

7 Q. Did anyone ever tell Mr. Chen, No need to
8 hurry up because we actually figured out the answer to
9 this in 2017?

10 A. Your question is quite strange. That's
11 because before the notification from Novartis, no one
12 had the knowledge that there was NDMA in valsartan.

13 Q. Well, aside from Jin -- Jinsheng Lin and
14 yourself and everyone who received that e-mail in
15 2017, but I'll move on.

16 Mr. Goldberg asked you a series of
17 questions about whether Mr. Chen was involved in
18 things like testing and chromatography and development
19 of analytical methods.

20 Is it part of your job description to know
21 what Mr. Chen does from -- on a day-to-day basis?

22 A. It -- it is not. However, as for whether
23 Mr. Chen did any testing, the QC department, for
24 people working in the QC department, we have to get